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UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF CALIFORNIA

25 COME NOW THE PARTIES HERETO, by and through their respective counsel, and
26 hereby stipulate as follows, that:

**Stipulation and Proposed Order Continuing
Initial Case Management Conference and
Related Deadlines**

1 WHEREAS, Defendant UNITED STATES OF AMERICA appeared herein on July 10,
2 2009; and,

3 WHEREAS, counsel for the parties met and conferred in person on Monday, July 21,
4 2009, to discuss initial disclosures and ADR planning, in compliance with the Court's May 5,
5 2009 Order Setting Initial Case Management Conference and ADR deadlines;

6 The following continuances are respectfully requested in order to give the parties
7 adequate time to prepare for the Initial Case Management Conference and to file and exchange the
8 required documents prior to said Conference:

Currently Scheduled Date	Proposed Continued Date
Initial Case Management Conference August 14, 2009, 1:30 p.m.	September 18, 2009, 1:30 p.m.
filing of Joint Case Management Statement August 7, 2009	September 11, 2009
filing of Rule 26(f) Report August 7, 2009	September 11, 2009
exchange of Initial Disclosures August 7, 2009	September 11, 2009
filing of ADR Certification and either Stipulation to ADR Process or Notice of Need for ADR Phone Conference July 24, 2009	September 11, 2009

26 IT IS SO STIPULATED:
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29 Stipulation and ~~Proposed~~ Order Continuing
30 Initial Case Management Conference and
31 Related Deadlines

1 Dated: June 21, 2009
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McGUINN, HILLSMAN & PALEFSKY
Attorneys for Plaintiff

By: /s/ Derek B. Jacobson

Derek B. Jacobson

Dated: _____

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By: /s/ Jean M. Franken

Jean M. Franken
Trial Attorney
Torts Branch, Civil Division
U.S. Department of Justice

**ORDER CONTINUING INITIAL CASE MANAGEMENT CONFERENCE
AND RELATED DEADLINES**

GOOD CAUSE APPEARING THEREFOR, the Initial Case Management Conference scheduled for August 14, 2009, is hereby continued to the new date of Friday, September 18, 2009, at 1:30 p.m., and the Court hereby adopts the rescheduled deadlines set forth above.

IT IS SO ORDERED.

Dated: July 31, 2009

Stipulation and Proposed Order Continuing
Initial Case Management Conference and
Related Deadlines

